

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON ELECTION INTEGRITY)	
COALITION UNITED, a Washington State)	
Nonprofit Corporation; DOUG BASLER;)	No. 2:21-cv-01394
HOWARD FERGUSON; DIANA BASS;)	
TIMOFEY SAMOYLENKO; AMY BEHOPE;)	
MARY HALLOWELL; SAMANTHA BUCARI;)	NOTICE OF REMOVAL
RONALD STEWART; LYDIA ZIBIN;)	
CATHERINE DODSON,)	
)	
Plaintiffs,)	
v.)	
)	
JULIE WISE, Directory of King County)	
Elections; KING COUNTY, and DOES)	
1-30, inclusive,)	
)	
Defendants.)	

TO: Clerk of the Court;

AND TO: All parties and their counsel of record.

Defendants Julie Wise, in her official capacity, and King County (hereinafter, "King County Defendants"), by and through their undersigned attorneys, hereby give notice and petition for the removal of the above-referenced action, and in support thereof, states as follows:

1. Plaintiffs commenced the above-titled action in the Superior Court of the State of Washington for King County, under Washington Election Integrity Coalition United, et al. v. Julie Wise, et al., King County Superior Court Cause No. 21-2-12603-7 KNT on September 22,

1 2021. Plaintiffs served the King County Defendants on September 23, 2021. This action is now
2 pending in that Court.

3 2. This notice is filed within 30 days after service of the original Summons and
4 Complaint on the King County Defendants, pursuant to 28 U.S.C. § 1446(b), and thus, this
5 action can be removed to this Court.

6 3. This is a civil action over which this Court has original and supplemental
7 jurisdiction under 28 U.S.C. § 1441(a) and 28 U.S.C. § 1367(a). This Court has original
8 jurisdiction of all civil actions arising under the Constitution and laws of the United States.
9 Plaintiffs have asserted claims that Defendants have violated the First and Fourteenth
10 Amendments to the United States Constitution and federal law, 52 U.S.C. § 20971 and 42 U.S.C.
11 § 1983 and § 1988. Because this Court has original jurisdiction of these claims, the entire action
12 can be removed pursuant to 28 U.S.C. § 1441(c). Additionally, this Court has supplemental
13 jurisdiction over Plaintiff's remaining state law claims. In any civil action of which this Court
14 has original jurisdiction, this Court also "shall have supplemental jurisdiction over all other
15 claims that are so related to claims in the action within such original jurisdiction that they form
16 part of the same case or controversy." 28 U.S.C. § 1367(a). Like the claims arising under the
17 United States Constitution, Plaintiffs' state law claims arise from the same conduct that Plaintiffs
18 allege violates the United States Constitution. Plaintiffs' state law claims are "so related" to their
19 federal claims as to "form part of the same case or controversy." This action may therefore be
20 removed to this Court pursuant to 28 U.S.C. § 1441(c) and 28 U.S.C. § 1367(a).

21 4. The underlying Complaint is being filed contemporaneously with this Notice of
22 Removal as a separate attachment. Pursuant to 28 U.S.C. § 1446(c) and LCR 101(b), the King
23 County Defendants have also filed the Attorney Verification of State Court Record

1 simultaneously with this Notice of Removal, as well as a copy of this Notice of Removal with
2 the King County Superior Court.

3 WHEREFORE, the King County Defendants give notice and request that the above
4 action now pending against them in the State of Washington for King County be removed to the
5 United States District Court for the Western District of Washington at Tacoma, pursuant to 28
6 U.S.C. § 1441 and § 1446.

7
8 DATED this 13th day of October, 2021.

9 DANIEL T. SATTERBERG
10 King County Prosecuting Attorney

11 By: s/Ann M. Summers
12 ANN M. SUMMERS, WSBA #21509
13 DAVID J. HACKETT, WSBA #21236
14 MARI ISAACSON, WSBA #42945
15 JANINE JOLY, WSBA #27314
16 Senior Deputy Prosecuting Attorneys
17 Attorneys for Defendants
18 1191 Second Avenue, Suite 1700
19 Seattle, WA 98101
20 Phone: (206) 296-0430/Fax: (206) 296-8819
21 ann.summers@kingcounty.gov
22 david.hackett@kingcounty.gov
23 mari.isaacson@kingcounty.gov
Janine.joly@kingcounty.gov

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF E-filing system and sent a copy of which via US Postal service to the following:

WASHINGTON ELECTION INTEGRITY COALITION UNITED

Tamborine Borrelli
13402 125th Avenue NW
Gig Harbor, WA 98329-4215

Doug Basler
Plaintiff, Pro Se
1851 Central Place S. Suite 123
Kent, WA 98032

Howard Ferguson
Plaintiff, Pro Se
4537 13th Avenue S
Seattle, WA 98108

Diana Bass
Plaintiff, Pro Se
PO Box 7364
Bellevue, WA 98008

Timofey Samoylenko
Plaintiff, Pro Se
1921 R. Street NE
Auburn, WA 98002

Amy Behope
Plaintiff, Pro Se
507 SW 302nd Street
Federal Way, WA 98023

Mary Hallowell
Plaintiff, Pro Se
17505 462nd Avenue SE
North Bend, WA 98045

1 Samantha Bucari
2 Plaintiff, Pro Se
3 3546 S. 244th Street
4 Kent, WA 98032
5 sbucari2108@gmail.com

6 Ronald Stewart
7 Plaintiff, Pro Se
8 29506 51st Avenue South
9 Auburn, WA 98001

10 Lydia Zibin
11 Plaintiff, Pro Se
12 254 145th Place SE
13 Bellevue, WA 98007

14 Catherine Dodson
15 Plaintiff, Pro Se
16 42131 212th Avenue SE
17 Enumclaw, WA 98022

18 I declare under penalty of perjury under the laws of the State of Washington that the
19 foregoing is true and correct.

20 DATED this 13th day of October, 2021.

21 s/Kris Bridgman
22 KRIS BRIDGMAN
23 Paralegal – Litigation Section
King County Prosecuting Attorney's Office